

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

UNITED STATES OF AMERICA
Plaintiff,

v.

ERIKA SUSAN PERDUE,
Defendant.

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No. 3:12-CR-134-L

E.C.F.

DEFENDANT'S UNOPPOSED MOTION FOR CONTINUANCE

TO THE HONORABLE COURT:

Defendant Erika Susan Perdue respectfully moves this Court for a continuance of the trial and associated dates in this case, and in support presents the following:

1. The Court has entered a Scheduling Order in this case setting the deadline for Motions on August 3, 2102, and trial on September 10, 2012.

2. The defense has retained a forensics expert to analyze the computers and other electronic devices seized by the FBI as evidence in support of the charges in this case. It is essential that the defense expert be allowed to examine these items in preparation for the trial of this case. Unfortunately, the defense expert is not available to be able to perform this work until the end of July or first of August due to previous commitments.

3. In addition, one of defendant's counsel has two federal trials scheduled in October. Accordingly, Defendant Perdue requests that the trial in this case be continued to a date no earlier than November 2012.

4. Should the Court grant the requested continuance, the defense agrees that any period of delay resulting therefrom, made necessary by this request for continuance, shall be excludable under 18 U.S.C. § 3161(h)(7)(A). Additionally, the ends of justice served by the granting of this continuance outweigh the best interests of the public and the Defendant in a speedy trial, 18 U.S.C. §

3161(h)(7)(A).

5. Counsel spoke with Assistant United States Attorney Camille E. Sparks who stated that the government does not oppose this motion.

WHEREFORE, Defendant Perdue respectfully asks the Court to grant this Motion for Continuance.

Respectfully submitted,

/s/ Deborah Goodall
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Attorney for Erika Susan Perdue

CERTIFICATE OF CONFERENCE

I certify that I spoke with AUSA Camille Sparks about this Motion and the grounds therefor, and she expressed no objection to the Court's granting a continuance.

CERTIFICATE OF SERVICE

I hereby certify that on July 3, 2012, I caused a copy of the foregoing Motion to be delivered to the Honorable Sam A. Lindsay, United States District Judge, Northern District of Texas; and Assistant United States Attorney Camille E. Sparks, at 1100 Commerce Street, Dallas, Texas, 75202.

/s/ Deborah Goodall
DEBORAH GOODALL